

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

FEI GUAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:17-cv-332
	)	
BING RAN, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DEFENDANT QI TECH, LLC'S MOTION TO DISMISS**

Defendant Qi Tech, LLC ("Qi Tech"), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby moves to dismiss the Complaint filed by Plaintiff Fei Guan for failure to state a claim upon which relief can be granted. The grounds for Qi Tech's motion are set forth more fully in the supporting memorandum filed contemporaneously herewith.

WHEREFORE, Qi Tech respectfully requests that the Court dismiss the Complaint as to Qi Tech in its entirety.

Dated: April 25, 2017

Respectfully submitted,

QI TECH, LLC.

By: \_\_\_\_\_/s/

Robert R. Vieth  
VSB No. 24304  
Mihir V. Elchuri  
VSB No. 86582  
Attorneys for Defendant Qi Tech, LLC  
HIRSCHLER FLEISCHER,  
A PROFESSIONAL CORPORATION  
8270 Greensboro Drive, Suite 700  
Tysons, VA 22102

Telephone: 703.584.8900  
Facsimile: 703.584.8901  
E-mail: rvieth@hf-law.com  
melchuri@hf-law.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of April 2017, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of Court for the Eastern District of Virginia, Alexandria Division, using the Court's CM/ECF system, which thereby caused the above to be served electronically on all registered users of the Court's CM/ECF system who have filed notices of appearance in this matter.

\_\_\_\_\_  
/s/

Mihir V. Elchuri  
VSB No. 86582  
Attorney for Defendant Qi Tech, LLC  
HIRSCHLER FLEISCHER,  
A PROFESSIONAL CORPORATION  
8270 Greensboro Drive, Suite 700  
Tysons, VA 22102  
Telephone: 703.584.8900  
Facsimile: 703.584.8901  
E-mail: melchuri@hf-law.com